

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
(Eastern Division)

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CHARLES C. JOHNSON and  
GOT NEWS, LLC

Plaintiffs,

v.

GAWKER MEDIA, LLC, J.K. TROTTER,  
and GREG HOWARD

Defendants.

Case No. 14:15-cv-01137

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**DECLARATION OF JOSEPH KEENAN TROTTER**

I, JOSEPH KEENAN TROTTER, declare as follows:

1. I am a defendant in this matter. I am competent to testify as to the facts set forth below, and, if called as a witness, could and would testify to such facts based on personal knowledge and under oath.

2. At all times relevant to this lawsuit, I was a staff writer at Gawker Media, LLC, a defendant in this action.

3. I am a domiciliary of the State of New York and live and work in New York City, New York.

4. As pertinent to this matter, I wrote two articles published to Gawker Media, LLC's website, *Gawker*, and related to Charles C. Johnson.

5. One article, published on December 9, 2014, is titled "What Is Chuck Johnson, and Why? The Web's Worst Journalist, Explained" and is available at <http://gawker.com/what-is-chuck-johnson-and-why-the-web-s-worst-journal-1666834902>.

6. A second article, published on December 15, 2014, is titled "Which of These Disgusting Chuck Johnson Rumors are True?" and available at <http://gawker.com/which-of-these-disgusting-chuck-johnson-rumors-are-true-1669433099>.

7. In reporting the second article, I did contact Johnson, who I understood to be in California when I contacted him. To the best of my knowledge, none of the additional sources I used in reporting the articles lived in Missouri nor did I travel to Missouri in the process of my reporting.

8. I do not own any real or personal property located in Missouri. I also do not maintain a bank account in Missouri. Additionally, I have never voted or been registered to vote in Missouri and have never been employed in Missouri.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 8/20/15



JOSEPH KEENAN TROTTER

**CERTIFICATE OF SERVICE**

The undersigned certifies that on this 24th day of August, 2015, a true copy hereof was served with the Clerk of the Court using the CM/ECF system on the following:

Jonathon Christian Burns  
THE BURNS LAW FIRM, LLC  
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*Attorneys for Plaintiffs*

By: /s/ Joseph E. Martineau